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May 3, 2017

## Via ECF

The Honorable James C. Francis United States Magistrate Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Re: Agerbrink v. Model Service LLC d/b/a MSA Models et al., No. 14 Civ. 7841 (JPO) (JCF)

Dear Judge Francis:

My firm represents the Plaintiff and the putative class in the above-referenced matter. We are in the process of filing a motion to amend the operative Second Amended Class Action Complaint later this week.

We write to request leave to: (1) file placeholders as exhibits and apply redactions on ECF for documents designated as confidential filed in support of Plaintiff's forthcoming motion; (2) provide the Court with unredacted courtesy copies of these confidential submissions within one business day of filing on ECF; (3) provide unredacted copies of these confidential submissions to Defendants within one business day of filing on ECF; and (4) file the confidential exhibits and unredacted versions of submissions with the sealed records clerk within one business day of filing on ECF.

Respectfully submitted,

/s/ Cyrus E. Dugger

Attorney for Plaintiff and the putative class

cc: (via ECF)

Defendants' counsel